In the Drawings

Figure 1 has been amended to include the text "Prior Art". For the Examiner's convenience, a "Marked-Up" version of Figure 1 is attached, showing the changes that were made in red ink. Upon indication of allowance, Applicants will submit replacement formal drawings for Figure 1.

REMARKS

Claims 1-14 are pending. Claims 1-10 have been amended. Claims 11-14 are newly presented. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

In the Drawings and Specification

The drawings were objected to as containing minor typographical errors. As indicated by the attached "marked-up" version of drawings, Applicants have amended Figure 1 to include the text "Prior Art" in accordance with the Examiner's suggestions. Additionally, applicants have amended the specification to include the missing references numerals as indicated by the Examiner. No new matter has been added by these amendments. Accordingly, Applicants respectfully submit that this objection is moot. Upon indication of a notice of allowance, Applicant will submit replacement formal drawings for these figures.

Additionally, the abstract was objected to as containing minor informalities. Applicants have amended the abstract to correct these informalities. Accordingly, Applicants respectfully request reconsideration and withdrawal of this objection.

Claim Objections

Claims 2, 4, 8, and 9 were objected to as containing a minor typographical errors. Applicants have amended the claims to correct these typographical errors. Accordingly, Applicants respectfully submit that this objection is moot.

Claim Rejections Under 35 U.S.C. § 112

Claims 4 and 11 were rejected under 35 U.S.C. § 112, second paragraph for containing various informalities. Applicants have amended the claims to correct these informalities. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claim Rejections Under 35 U.S.C. § 101

Claims 1-4 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Applicants have amended the claims and respectfully submit that the amended claims are directed to statutory subject matter at least because these claims recite a useful system that is functional and produces a useful result. Specifically, claim 1 now recites a system that includes a dependent reader means and an independent linker

means for receiving detected liking information from the dependent reader means. See, for example, *Diamond v. Chakrabarty*, 447 U.S. 303, 308-09 (1980) – indicating that the expansive language of section 101 includes "anything under the sun that is made by man". Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claim Rejections Under 35 U.S.C. § 102

A. Claims 1-10 were rejected under 35 U.S.C. § 102(b) over Quong et al. ("Linking Programs Incrementally", ACM 1991). Applicants respectfully traverse this rejection.

Claim 1 recites, in part, an incremental remote loading system that includes a dependent reader module for receiving a cross-compiled object file from a program development tool, analyzing the cross-compiled object file according to a type of an object file and detecting independent linking information from the type of the cross-compiled object file. The system also includes an independent linker module for receiving the detected liking information from said dependent reader module. In contrast, Quong discloses an incremental linker that processes only the changed modules. Specifically, as discussed in the introduction, Quong discloses that the job of the linker is to ... (2) resolve all cross-references between modules (i.e., the linker receives and analyses the information). Quong does not disclose a reader module recited in claim 1. Accordingly, Quong fails to teach, or even suggest, an incremental remote loading system that includes (1) a dependent reader module for receiving a cross-compiled object file from a program development tool, analyzing the cross-compiled object file according to a type of an object file and detecting independent linking information from the type of the cross-compiled object file, and (2) an independent linker module for receiving the detected liking information from said dependent reader module, as recited in claim 1.

Claims 5 and 10 are believed allowable for at least the reasons presented above with respect to claim 1 because claims 5 and 10 recite features similar to the features of claim 1 discussed above.

Claims 2-4 and 6-9 are believed allowable for at least the reasons presented above with respect to claims 1 and 5 by virtue of their dependence upon claims 1 and 5. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

New Claims

Claims 11-14 are newly presented, fully supported by the originally filed specification, and believed allowable over the prior art of record.
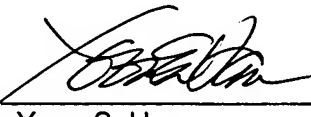
Conclusion

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

MAYER BROWN ROWE & MAW LLP

By:

Yoon S. Ham
Registration No. 45,307
Direct No. (202) 263-3280

YSH/VVK

Intellectual Property Group
1909 K Street, N.W.
Washington, D.C. 20006-1101
(202) 263-3000 Telephone
(202) 263-3300 Facsimile

Date: June 9, 2005

"Marked-up version"
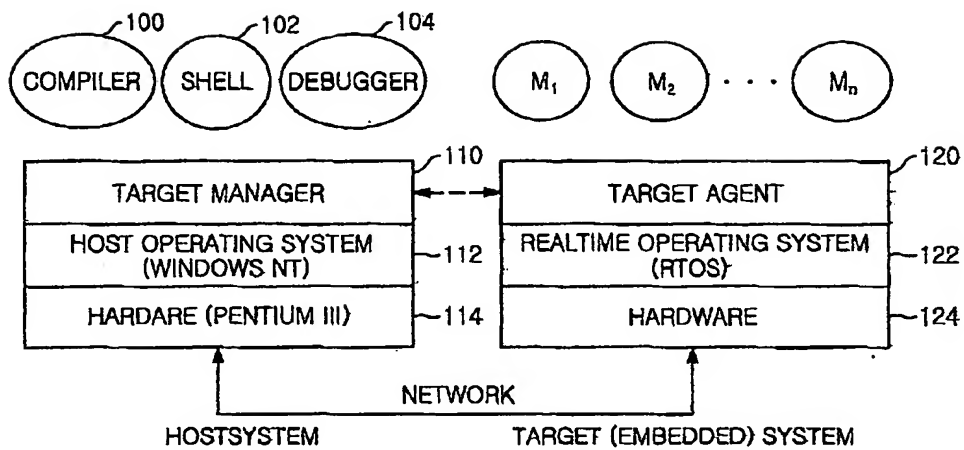
FIG. 1
PRIOR ART

COMPILER ~100 SHELL ~102 DEBUGGER ~104   M₁ M₂ · · · Mₙ

TARGET MANAGER ~110	← - - →	TARGET AGENT ~120
HOST OPERATING SYSTEM (WINDOWS NT) ~112		REALTIME OPERATING SYSTEM (RTOS) ~122
HARDARE (PENTIUM III) ~114		HARDWARE ~124

NETWORK

HOSTSYSTEM   TARGET (EMBEDDED) SYSTEM

FIG. 2

SHELL   DEBUGGER   MONITOR

FRONT END ~210

220 —
230 —   LINKER   LOADER

TARGET SYNBOL TABLE MANAGER ~240

TARGET MEMORY MANAGER ~250   TARGET AGENT

260 ~ BACK END